

REMARKS

This is in response to the Office Action dated December 11, 2003. In the Office Action, claims 1, 2, 9-10 and 20 were rejected and claims 3-8 and 11-19 were objected to. Applicants respectfully request reconsideration and allowance of all pending claims 1-20.

I. DRAWING OBJECTIONS

In section 3 of the Office Action, the Examiner objected to the drawings. Specifically, the Examiner stated that "in Figure 3, the label '220' should be added for clarity." By way of this Amendment, the label "220" has been added to Figure 3 in accordance with the Examiner's suggestion and therefore the rejection must be withdrawn.

II. CLAIM REJECTIONS UNDER 35 U.S.C. §103

In section 5 of the Office Action, claims 1, 2, 9 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Krantz et al., U.S. Patent No. 6,530,000, in view of Berning et al., U.S. Patent No. 6,038,619. In section 8 of the Office Action, claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over Krantz et al., U.S. Patent No. 6,530,000, in view of Berning et al., U.S. Patent No. 6,038,619, and further in view of Tamura, U.S. Patent No. 6,389,508.

Independent claim 1 includes "a traversal component configured to receive a requested traversal, arbitrate ownership of the memory and to traverse sequentially mapped entries in the memory, associated with the requested traversal, prior to de-arbitrating itself from ownership of the memory." The Examiner acknowledges that Krantz does not show the above element of claim 1 by stating, at the top of page 3 of the Office Action, that Krantz does not explicitly disclose that sequentially mapped entries are traversed. However, the Examiner goes on to suggest that Berning (Abstract; column 3, lines 25-40) teaches a buffer which, when requests for sequential entries are detected, allows

the requester to continue to stream data unabated through the buffer. It is respectfully pointed out that the cited language of Berning relates to a method of processing consecutive read or write requests, imposed on a disk drive, and not to the retrieval of sequential entries, in a buffer, that are associated with a single read/write request imposed on the data storage device. Such a system, which is only responsive to the receipt of two or more consecutive read/write requests that are of the same type and bear a defined sequential logical address relationship, is in contrast with receiving "a requested traversal" and processing "sequentially mapped entries in the memory, associated with the requested traversal" as required by claim 1.

Since all the elements of the present invention as claimed by claim 1 are not taught by the cited prior art, the Examiner has failed to support any *prima facie* conclusion of obviousness with regard to claim 1. Furthermore, the Examiner provided no evidentiary basis for modifying the cited references to arrive at the present invention as claimed by claim 1. Thus, it is believed that independent claim 1 is patentably distinct and non-obvious over the cited prior art.

Independent claims 9 and 20 have elements similar to that of independent claim 1. Thus, for the same reasons as independent claim 1, Applicants submit that independent claims 9 and 20 are allowable as well. Moreover, Applicants respectfully submit that the dependent claims are also allowable over the cited art (Krantz, Berning and Tamura) by virtue of their dependency, either directly or indirectly from the allowable independent claims. Further, the dependent claims set forth numerous elements not shown or suggested in the cited references.

In view of the foregoing, Applicants respectfully request reconsideration and allowance of all pending claims 1-20. Favorable action upon all claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: *A. Rego*  
Alan G. Rego, Reg. No. 45,956  
Suite 1600 - International Centre  
900 Second Avenue South  
Minneapolis, Minnesota 55402-3319  
Phone: (612) 334-3222 Fax: (612) 334-3312

AGR:tkj